



State of Utah

Department of
Environmental Quality

Dianne R. Nielson, Ph.D.
Executive Director

DIVISION OF AIR QUALITY
Richard W. Sprott
Director

JON M. HUNTSMAN, JR.
Governor

GARY HERBERT
Lieutenant Governor

MEMORANDUM

TO: Air Quality Board

THROUGH: Richard W. Sprott, Executive Secretary

FROM: Robert Clark, Environmental Scientist

DATE: September 6, 2006

SUBJECT: Propose for Public Comment: *8-Hour Ozone Maintenance Provisions for Salt Lake and Davis Counties*, to replace Section IX.D of the Utah State Implementation Plan (SIP). Amend R307-110-13 to reflect this change.

In July 1997, the EPA established a new, more rigorous standard for ozone. The new 8-hour standard was set at a level of 0.08 ppm (parts per million) averaged over an eight-hour period. Salt Lake and Davis Counties were designated as "attainment" under the 8-hour standard. The remainder of the State was designated as "attainment/unclassifiable."

Because Salt Lake and Davis Counties were attainment areas operating under an existing 1-hour ozone maintenance plan, EPA guidance requires a streamlined maintenance plan under the more general requirements of Section 110(a)(1) of the Clean Air Act. This guidance requires the 8-hour ozone maintenance plan to provide for continued maintenance of the 8-hour National Ambient Air Quality Standard (NAAQS) through 2014. It also specifies the required components of the plan, including an attainment inventory, a maintenance demonstration, an air quality monitoring program, a contingency plan, and a plan to verify continued attainment of the 8-hour NAAQS. The establishment of a Transportation Conformity Budget is not required under Section 110(a)(1). The guidance also stipulates that the maintenance plan would remain in effect after the initial 10-year period (2004-2014), and that contingency measures could still be triggered if the area subsequently violates the 8-hour standard.

There are several important differences between this 8-hour maintenance plan and the 1-hour plan:

1. The 1-hour maintenance plan included a case-by-case volatile organic compound (VOC)

reasonably available control technology (RACT) determination for Hill Air Force Base (Hill) and Olympia Sales. The intent of that determination was to demonstrate that current operations at these two sources were RACT, and that any future changes would be covered by the new source review (NSR) program. EPA interpreted this state implementation plan (SIP) provision in a more stringent manner than intended, and considered every provision in the applicable approval orders to be a SIP condition. To resolve this unworkable interpretation, we have worked with Hill to develop a new RACT determination for Hill to reflect underlying standards such as Utah's RACT rules and federal maximum achievable control technology (MACT) standards. Because the MACT standards were implemented since the previous 1-hour maintenance plan was adopted, the overall RACT level will now be more stringent than what was considered RACT in the mid-1990's.

2. When the 1-hour ozone maintenance plan was originally adopted in 1993, EPA required Utah to include contingency measures that were already adopted and could be implemented quickly. It was later discovered that the contingency measures did not need to be adopted, but could be identified as potential contingency measures that could be evaluated and adopted within a reasonable time period after an ozone violation occurred. In this 8-hour maintenance plan, a list of possible contingency measures is included. However, DAQ is recommending deleting the pre-approved rules for Stage II Vapor Recovery and several other contingencies because if and when they may be triggered in the future, those contingencies that are implemented will be selected based on information available at that time.

3. The Inspection and Maintenance Program performance standards for Salt Lake and Davis Counties are reestablished using EPA MOBILE6 software and the target years have been extended through 2014.

4. Everything addressing the 1-hour NAAQS is deleted. This plan was adopted in the early 1980's and is no longer applicable because it was developed to attain the 1-hour ozone standard.

This SIP was developed according to current EPA guidance and demonstrates that Salt Lake and Davis Counties will remain in compliance to the Ozone NAAQS through 2014.

Recommendation: Staff recommends that the 8-hour ozone maintenance plan be proposed for public comment and that R307-110-13 be amended to reflect this change.